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Refer to: L09719014 - Lake County
Waukegan - Johns-Manville
Superfund/General Correspondence

March 26, 1986

Rodney Gaither, RPM
USEPA
230 South Dearborn
Chicago, Illinois 60604

Dear Rodney:

I have completed my review of the Draft Feasibility Study for Johns-Manville project. In addition to the comments submitted by PRC I have listed the following as areas of my concern. Please find attached a listing of those comments to be included in your final review.

Sincerely,

Jeff Larson, Project Manager
Federal Site Management Unit
Remedial Project Management
Division of Land Pollution Control

JL:ds:0667F/34

cc: Robert Cowles, IEPA
Gloria Craven - IEPA
Ed Lyn - IEPA - Maywood
Don Gimble - IEPA - Maywood
Dan Caplice - USEPA
Karen Yeates - USEPA
Author
Division File

L0971900014 Lake Co.
Johns-Manville
Superfund/General Correspondence

IEPA COMMENTS FOR JOHNS-MANFILLE FEASIBILITY STUDY
March, 1986

Page 2-1, 2.1.2 SITE HISTORY

A statement implies that there is presently no asbestos being deposited at J.M. This contradicts page 2.5 para. 1 stating that J.M. receives limited quantities of friable asbestos waste.

Page 2-11, 2.2.1 WASTE CHARACTERISTICS AND QUANTITIES

Process Water Sludge. Question - Doesn't the sludge dry out overtime and release asbestos? Also as per quantities the paragraph states that 50% of the 175,000 c.y. of sludge is deposited in a disposal pit and 50,000 c.y. in a settling basin, what about the other 37,500 c.y. of sludge remaining?

Page 4-3, 4.2.1.2 CLEARING AND GRUBBING

I feel that burning of grubbed trees and roots would be better than burying. This eliminates the possibility of soil piping after decomposition.

Page 4-4, 4.2.1.3 GRADING WASTES

Maximum dike slope should be 1:3.

Page 4-4, 4.2.1.5 REVEGETATION WITH GRASS AND SHRUBS

I feel that a spinning disk or drop seeder would be better, with a krimper used to place straw mulch. Should add an annual rye to the seed mix. Everything depends on fill soil pH results for soil amendments. Trees and shrubs should be planted in pits to be excavated and lined with fabric. Trees should have fiberous root systems, not tap roots. (Maybe maples and ash, etc.).

Page 4-5, 4.2.1.6 PLACING RIPRAP ON SETTLING-BASIN

Slopes and Gravel. The limestone riprap should be specified to a large enough type so as not to move, i.e., 8-12" diameter (100-150 pounds) drop method of placement.

The 24" coversoil layer should have an organic content to it, be tested for pH, reserve acidity & alkalinity. Perhaps gravel roadways should have a geotechnical fabric placed on a compacted base, then have the gravel, (Type A) road surface placed and compacted to a 90% density.

Page 4-6, 4.2.1.9 ADDITION

Decontamination of haulage trucks and vehicles. Trucks coming on-site to deposit fill shall be sprayed off on a DECON pad prior to leaving the site. Wash water will be drained to basins on-site.

Page 4-8, 4.4.1.1 WASTE REMOVAL AND HANDLING

Inspection of soils during excavation, to be possibly used as fill material never works as planned. It's not only very costly and troublesome, but causes time delays. Someone is needed to make decisions on-site at all times. You can't always judge a soil by visual inspection of what's clean.

Page 4-9, 4.4.1.1 WASTE REMOVAL AND HANDLING

The USEPA off-site policy will hurt this alternaive as there are no facilities in compliance for CERCLA wastes. Changes may have to occur to the off-site policy. A decision on when compliance must occur during the project, is one example of wording problems. This policy could cost the government thousands of dollars in downtime, remobilization fees, and staff time in negotiations on liquidation penalties.

Page 4-9, 4.4.1.2 REBUILDING OF PROCESS WATER TREATMENT AND SITE GRADING

Wouldn't it be better to build slurry settling impoundments that are deep and not wide and shallow. How about future electrolysis methods in dewatering of slurry impoundments?

Page 4-13, 4.5.1.3 COLLECTION AND TREATMENT OF LEACHATE AND RUNOFF

Leachate Collection system should drain into a catch basin. Leachate Detection system should drain into a separate catch basin.

Page 4-13, 4.5.1.4 PLACING MULTI-LAYERED CAP FOR CLOSURE

The sand from on or off-site to be used for the infiltration layer should be free of sharp objects or stones larger than a fist. The shaped surface of the waste material should also be free of sharp objects which could puncture the synthetic liner.

JL:mgg0691f/24-25